REMARKS

Claims 16, 17, 19-21, 24, and 32-38 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and remarks.

Claims 16, 17, 19-21 and 32-34 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky et al. (US Application No. 2003/0190054) in view of Lewis (Lewis, R., "Adobde Pagemill 2.0 Handbook,") and further in view of Levy et al. (US Application No. 2003/0012548). The Examiner stated essentially that the combined teachings of Troyansky, Lewis and Levy teach or suggest all the limitations of Claims 16, 17, 19-21 and 32-34.

Claim 16 claims, *inter alia*, "converting, automatically by the server, the textual content in text format to the textual content in the image format according to the content creation preference; storing the textual content in the image format; generating an HTML document containing an inline reference to the stored textual content in the image format for retrieval and dynamic assembly by the client; and replying to the request by serving the HTML document containing the inline reference to the stored textual content in the image format, wherein the reply does not include the textual content in the image format."

Troyansky teaches a system and method for providing uniquely marked copies of data content via digital watermarks (see Abstract and paragraph [0124]). Troyansky does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format for retrieval and dynamic assembly by the client" as claimed in Claim 16. Troyansky teaches a content processor that forms the sets of marked segments prior to

distribution of the data content (see paragraph [0114]). The assembly of <u>Troyansky</u> is performed by a server (see for example, FIG 3) – no inline reference is taught as the client does not perform assembly. Further, it is clear that the data stream with the embedded message is part of the reply; compare Claim 16, wherein "the reply does not include the textual content in the image format." Therefore, <u>Troyansky</u> does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format", much less that "the reply does not include the textual content in the image format", essentially as claimed in Claim 16. Thus, <u>Troyansky</u> fails to teach or suggest all the limitations of Claim 16.

<u>Lewis</u> teaches that HTML tells a computer how to interpret hypertext documents (see page 13, second paragraph). <u>Lewis</u> does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. <u>Lewis'</u> PageMill generates HTML code, which may include <IMG> tags (see page 139, line 3). <u>Lewis</u> fails to teach or suggest how <IMG> tags are handled, more particularly <u>Lewis</u> fails to teach or suggest "an inline reference to the stored textual content in the image format" essentially as claimed. Therefore, <u>Lewis</u> fails to cure the deficiencies of <u>Troyansky</u>.

<u>Levy</u> teaches a method by which a server performs integration of a watermark in content (see paragraph [0093]). <u>Levy</u> does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. In <u>Levy's</u> method a client is a creator of content and watermarked content desiring to tailor audio or video content presented to consumers (see paragraphs [0078] and [0033]). This type of client is very different from the client of Claim 16 - the client of Claim 16 is a requestor of content <u>from</u> the server. <u>Levy's</u> client is a provider of content <u>to</u> the server. More particularly, <u>Levy</u> teaches that content, a watermark and watermark parameters are sent to a server for

integration and returned as a complete document for later broadcast to consumers. Clearly then, this is not analogous to retrieval and inline dynamic assembly <u>by</u> the client, essentially as claimed in Claim 16 – <u>Levy</u> does not teach an inline reference. Moreover, the server of <u>Levy</u> returns content as a complete document for later broadcast to consumers - such a reply is clearly distinguishable from a "reply [that] does not include the textual content in the image format", essentially as claimed in Claim 16. Therefore, <u>Levy</u> fails to cure the deficiencies of <u>Troyansky</u> and <u>Lewis</u>.

      The combined teachings of <u>Troyansky</u>, <u>Lewis</u> and <u>Levy</u> teach a server embedding content into data. Therefore, the combined teachings of <u>Troyansky</u>, <u>Lewis</u> and <u>Levy</u> fail to teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format", nor a "reply [that] does not include the textual content in the image format" as claimed in Claim 16.

      Claims 17, 19-21 and 32-34 depend from Claim 16. The dependent claims are believed to be allowable for at least the reasons given for Claim 16. Reconsideration of the rejection is respectfully requested.

      Claim 24 has been rejected under 35 USC 103(a) as being unpatentable over <u>Troyansky</u>, <u>Lewis</u>, <u>Levy</u> and further in view of <u>Minematsu</u> (US 6,700,993). The Examiner stated essentially that the combined teachings of <u>Troyansky</u>, <u>Lewis</u>, <u>Levy</u> and <u>Minematsu</u> teach all the limitations of Claim 24.

      Claim 24 depends from Claim 16. The dependent claims are believed to be allowable for at least the reasons given for Claim 16. Reconsideration of the rejection is respectfully requested.

Referring to Claim 35; Claim 35 claims, *inter alia*, "storing the textual content in the image format as a uniquely addressable element identified by a Uniform Resource Locator (URL); generating an HTML document containing an inline reference comprising the URL to the stored textual content in the image format for retrieval and dynamic assembly by the client."

The combined teachings of Troyansky, Lewis and Levy teach <IMG> tags referring to images in a file together with HTML code - such a tag does not a uniquely addressable element as claimed. The combined teachings of Troyansky, Lewis and Levy fail to teach or suggest, "storing the textual content in the image format as a uniquely addressable element identified by a Uniform Resource Locator (URL)" as claimed in Claim 35.

Claims 36-38 depend from Claim 35. The dependent claims are believed to be allowable for at least the reasons given for Claim 35. Reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 16, 17, 19-21, 24, and 32-38, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

Dated: February 4, 2008

/Nathaniel T. Wallace/
Nathaniel T. Wallace
Reg. No. 48,909
Attorney for Applicants

F. CHAU & ASSOCIATES, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL: (516) 692-8888
FAX: (516) 692-8889